



November 6, 2017

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, NW
Washington, D.C. 20554

Re: Marvell Semiconductor, Inc. Ex Parte Letter, Use of Spectrum Bands Above 24 GHz, et al., WT Docket No. 14-177, IB Docket No. 15-256, RM-11664, WT Docket No. 10-112, IB Docket No. 97-95

Dear Ms. Dortch:

Marvell Semiconductor Inc. (Marvell) writes to respectfully urge the Federal Communications Commission (FCC or Commission) to reaffirm its commitment to a balanced spectrum policy approach in the *Draft Spectrum Frontiers Report and Order* that includes shared licensed spectrum. We specifically request that the Commission dismiss the pending Petitions for Reconsideration of the decision to make the 37-37.6 GHz band available on a coordinated shared licensed basis.

Marvell is an industry leader in data storage, network infrastructure, and wireless connectivity. Having developed thousands of patents with multiple research and development centers in the United States, Marvell's expertise cuts across industries from cloud computing, to consumer technologies, to connected cars, to smart city services and industrial applications.

As a provider of components and products that serve a number of downstream industries, we want to maximize the opportunities for firms of all types to gain access to spectrum to deploy their technologies. We believe this can be best achieved through technologically-neutral and service-agnostic policies.

The evolution to "5G" creates a world of new opportunities for us and other wireless and technology providers. While "5G" is still evolving, it is clear that it will involve a multiplicity of technologies, users, service offerings, and spectrum bands. A technologically-neutral approach to millimeter wave (mmW) spectrum that has a mix of methods for users to gain access will create a ripe environment for innovation and investment.

However, because the *Draft Spectrum Frontiers R&O* does not reassert the availability of shared licensed access, it fails to resolve an outstanding issue that would provide greater certainty to the marketplace. Marvell is currently developing plans to leverage its expertise to enhance 5G services and technologies in the 37-37.6 GHz band. By not dismissing the Petitions regarding shared non-federal access in the 37-37.6 GHz band, the Commission leaves open the possibility that it may change course in the future, inhibiting our ability to fully commit to a substantial investment.

The Commission can easily eliminate this uncertainty. By denying the Petitions for Reconsideration, the Commission can assure the marketplace that there is a future of shared licensed spectrum access in the 37-37.6 GHz band, in addition to exclusively licensed and unlicensed access in other mmW bands. Clarity regarding shared licensed access will create the platform for significant investment in new 5G services and technologies, from Internet of Things, to industrial applications, to fixed wireless broadband.

Sincerely,

Mr. Mark Montierth
VP & GM, Connectivity of Marvell Semiconductor Inc.